

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, *et al.*

Plaintiffs,

v.

GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS, *et al.*

Defendants.

Case Number: 1:23-cv-10301-AS

**MOTION FOR LEAVE TO JOIN IN THE GOVERNMENT'S MOTION TO DISMISS**

COME NOW, Defendant CARLTON DOWE, and respectfully requests that this Court grant leave for Defendant Dowe to join in the arguments set forth in the Government of the United States Virgin Islands' Motion to Dismiss (Dkts. 67-70 (as corrected)). In support of this Motion, Defendant states as follows:

1. Plaintiffs filed their initial Complaint on November 22, 2023 and filed an Amended Complaint on December 13, 2023.
2. On February 7, 2024, Defendant requested a 30-day extension to respond to the Amended Complaint in order to permit Defendant to secure counsel licensed to practice before this Court. The Court granted that motion for extension on February 12, 2024, setting March 12, 2024 as the deadline to respond to the Complaint. (Dkt. 50).
3. Regrettably, due to a confluence of events, Defendant has been unable to secure counsel and therefore was unable to respond to the Amended Complaint by the Court deadline.
4. The Complaint sues Defendant only in his official capacity as a USVI Senator. *See* Am. Compl. ¶ 35.

5. Defendant has reviewed the arguments set forth by Defendant Government of the United States Virgin Islands in its Motion to Dismiss and believes that most, if not all, of the arguments are equally applicable to the claims against Defendant. Specifically, for the reasons set forth in that brief: (a) Defendant has not been properly served as a Government official; (b) the Court lacks Personal Jurisdiction over Defendant; (c) venue is improper in New York; and (d) the Complaint fails to state any claim against Defendant as a matter of law.

6. Defendant emailed counsel for Plaintiffs concerning this request on April 25, 2024, but has received no response.

WHEREFORE, Defendant Dowe respectfully requests that this Court grant him leave to join in the arguments set forth by the Government of the U.S. Virgin Islands in opposition to the First Amended Complaint.

Dated: May 16 2024

  
Respectfully Submitted,

/s/ Carlton Dowe  
CARLTON DOWE, pro se